

**EXHIBIT N**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

KELVIN D. DANIEL, et al

Plaintiffs,

v.

SWIFT TRANSPORTATION  
CORPORATION,

Defendant.

Case No. 2:11-cv-01548-PHX-ROS

**PLAINTIFF TANNA HODGES'  
ANSWERS TO DEFENDANT SWIFT  
TRANSPORTATION CO. OF  
ARIZONA, LLC'S SECOND SET OF  
INTERROGATORIES**

Assigned to: Hon. Roslyn O. Silver

**GENERAL OBJECTIONS**

1  
2           1.     Plaintiff, Tanna Hodges ("Hodges") objects to Swift's "General  
3 Instructions" and "Definitions" to the extent they purport to impose discovery obligations  
4 that differ from or exceed the discovery obligations imposed by the Federal Rules of Civil  
5 Procedure.  
6

7           2.     Hodges objects to the Interrogatories to the extent that they seek information  
8 protected by the attorney-client privilege, the work-product privilege, or any other  
9 privilege, protection, or immunity applicable under Arizona and/or federal law.  
10

11           3.     Hodges objects to the Interrogatories to the extent that they are overly  
12 broad, unduly burdensome, oppressive, and/or seek information that is not relevant to the  
13 issues in this lawsuit or reasonably calculated to lead to the discovery of admissible  
14 evidence.  
15

16           4.     These General Objections are made, to the extent applicable, in response to  
17 each of the Interrogatories as if the objections were fully set forth therein.  
18

19           5.     Hodges responds to each of the Interrogatories based upon information and  
20 documentation available as of the date hereof and reserve the right to supplement and  
21 amend her responses.  
22

23 \*\*\*\*\*  
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28

**INTERROGATORIES**

**Interrogatory No. 1:** Explain whether you were a class member in the litigation against HireRight Solutions, Inc. in the United States District Court for the Eastern District of Virginia, Case No. 3:09-cv-625, and, if you were, when you received notice of the suit, what class you were in, and what remedy, if any, you received as a class member in the settlement of that lawsuit.

**Response:**

**Objection.** Hodges objects to this Interrogatory as it seeks information irrelevant to the subject matter in this case and the information sought is not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding this objection and without waiving same, Hodges was a class member in the litigation mentioned in Interrogatory No. 1. Hodges does not recall when she received notice of the suit. Hodges was part of the 1681K – Legacy Procedures Class and received compensation in the amount of \$65.18.

**Interrogatory No. 2:** Explain whether you currently or have ever previously been a member of any other class action cases other than your current litigation against Swift and, if so, please identify the litigation and any remedy, if any, you received as a class member in that lawsuit.

**Response:**

**Objection.** Hodges objects to this Interrogatory as it seeks information irrelevant to the subject matter in this case and the information sought is not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding this objection and without waiving same, Hodges has not been a member of any other class action.

**Interrogatory No. 3:** Explain how you first came into contact with your attorneys regarding this suit, including the date, who made initial contact, the means of contact (through a web site, mailing, telephone call, etc.), whether you were solicited to become a class representative, whether you have been promised anything in exchange for being a class representative (such as an incentive award) and any amount promised.

**Response:**

1 **Objection.** Hodges objects to this Interrogatory as it seeks information irrelevant to the  
2 **subject matter in this case and the information sought is not reasonably calculated to lead to**  
3 **the discovery of admissible evidence. Further objecting, this interrogatory seeks**  
4 **information that is protected by the attorney-client privilege and/or work product doctrine.**

5  
6 **Interrogatory No. 4:** For the web site TruckersHaveRights.com, identify any class  
7 representative or putative class member in this Action or any other Swift employee or job applicant  
8 that submitted their information to Plaintiffs' counsel through that web site.

9 **Response:**

10 **Hodges objects to this Interrogatory as it seeks information from a third-party and the**  
11 **information sought is not reasonably calculated to lead to the discovery of admissible**  
12 **evidence.**

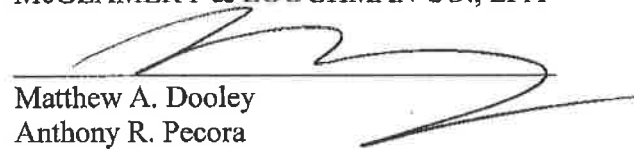
13 AS TO ALL OBJECTIONS:

14  
15   
Matthew A. Dooley

16  
17 Respectfully Submitted,

18 STUMPHAUZER, O'TOOLE, MCLAUGHLIN,  
19 McGLAMERY & LOUGHMAN CO., LPA

20 By:

21   
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26 *Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 14, 2012, the original and one copy of the foregoing was served via U.S. Mail, Postage Pre-Paid to the following counsel of record:

John F. Lomax, Jr., Esq.  
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Matthew A. Dooley  
*Counsel for Plaintiffs*

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VERIFICATION

STATE OF Texas )  
COUNTY OF Bexar ) SS:

Tanna Hodges, being duly sworn according to law, deposes and states that the answers to the foregoing 2<sup>nd</sup> Set of Interrogatories are true to the best of her knowledge and belief.

Tanna Hodges  
Tanna Hodges

SWORN TO BEFORE ME, a Notary Public, and subscribed in my presence this  
13<sup>th</sup> day of September, 2012.



Stephanie Talamantes  
Notary Public